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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	2:17-CV-344-JAD-(CWH)
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
\$417,073 IN UNITED STATES	)	United States' Unopposed Application To
CURRENCY seized from the premises of	)	Continue CAFRA Deadline
2656 North Ontario Street, Las Vegas	)	
Nevada;	)	(Third Request)
	)	
\$28,230.05 IN UNITED STATES	)	
CURRENCY seized from J.P. Morgan	)	
Chase Account No. xxxxxxx2849;	)	
	)	
\$21,146.37 in UNITED STATES	)	
CURRENCY seized from J.P. Morgan	)	
Chase Bank Account No. xxxxxx5561;	)	
	)	
Defendants.	)	

COMES NOW The United States of America and moves this Court to extend the CAFRA (Civil Asset Forfeiture Reform Act) deadline for 90 days or until September 11, 2017.

This is the Government's third request for an extension of the CAFRA deadline. On April 7, 2017, this Court previously granted a 60-day CAFRA extension deadline until June 11, 2017.

///

1        This current motion for a continued extension of the CAFRA deadline is  
2 unopposed by Claimants' Counsel.

3        Pursuant to 18 U.S.C. 983 (a)(2)(E), the United States has 90 days to file a civil  
4 complaint, if an interested party files a timely administrative claim with the seizing  
5 agency. In this case, Customs and Border Patrol seized the above-captioned defendants  
6 on August 17, 2016; and the claimants, Zalmi and Sona Basharyar, filed administrative  
7 claims with the Department of Homeland Security (United States Customs and Border  
8 Patrol) on November 10, 2016. As such, the United States was obliged to file its civil  
9 complaint in this case by February 10, 2017. In an uncontested motion filed on February  
10 3, 2017, the United States requested an additional sixty (60) days to file a civil forfeiture  
11 complaint in this case because it (the United States) was still in the process of  
12 determining whether there was/is sufficient evidence to file such a complaint. The  
13 United States was (and still is) gathering evidence to determine whether it can meet the  
14 burden of the preponderance of evidence necessary to file a complaint.

15        In addition, Claimants' counsel, in the person of Gabriel Grasso, has advised  
16 counsel for the United States that he (Grasso) is reviewing significant quantities of bank  
17 records that he would like to present to the Government to stave off a civil and/or  
18 criminal filing, or to, at least, provide a basis for settlement discussions. As of May 31,  
19 2017, Claimant's counsel advised counsel for the government that he had not yet  
20 harvested all of the information in a usable format, i.e., a thumb drive, but that he  
21 expected to provide the government with that information in the next few days.  
22 Claimant's counsel expects that the data he will provide to the Government is  
23 voluminous. As such it will take several weeks for the government to analyze and  
24 synthesize that information into a coherent form that will allow it to evaluate the worth of  
25 that information toward either litigation or settlement.

26        / / /

1 In addition, both counsel for the government and counsel for the Claimant will be  
2 out of the office and out of town for much of July 2017. In that regard, Claimants'  
3 counsel joins in this request so that he and the Government may continue to investigate  
4 this matter.

5 Accordingly, the United States requests an additional 90 days (or until September  
6 11, 2017) to complete its financial analysis and determine whether to file a complaint in  
7 this matter.

8 Counsel for the Government has consulted with the Claimants' counsel, Gabriel  
9 Grasso, and he has authorized Government counsel to represent to this Court that he does  
10 not object to this motion.

11 This motion is not submitted solely for the purpose to delay or for any other  
12 improper purpose.

13 WHEREFORE, for all of the reasons stated above, the United States moves this  
14 Court to continue the CAFRA deadline sixty (90) days or until September 11, 2017.

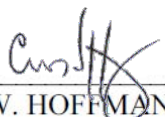
15 Dated: June 2, 2017

16 STEVEN W. MYHRE  
17 Acting United States Attorney

18 /s/ Michael A. Humphreys  
19 MICHAEL A. HUMPHREYS  
20 Assistant United States Attorney

21  
22 IT IS SO ORDERED.

23 DATED: June 5, 2017

24   
25 C.W. HOFFMAN, JR.  
26 UNITED STATES MAGISTRATE JUDGE